

July 10, 2017 Project No. 8128.02.02

Dana Bayuk Oregon Department of Environmental Quality Northwest Region 700 NE Multnomah Street, Suite 600 Portland, Oregon 97232

Re: Monthly Progress Report—June 2017 Siltronic Corporation 7200 NW Front Avenue, Portland, OR Order No. ECVC-NWR-00-27

Dear Dana:

The Order Requiring Remedial Investigation and Source Control Measures, Oregon Department of Environmental Quality (DEQ) No. ECVC-NWR-00-27, issued by DEQ to Siltronic Corporation (Siltronic) and NW Natural (NWN) on October 4, 2000 (the 2000 Joint Order), requires submittal of monthly progress reports. This progress report encompasses the reporting period spanning June 1, 2017 through June 30, 2017. The next progress report is due August 15, 2017.

Because the 2000 Joint Order and the 2016 Unilateral Order (No. OPSR-NWR-16-02, issued to Siltronic on August 16, 2016 [2016 UAO]) have overlapping requirements on the Siltronic Operable Unit (SOU), Siltronic has previously sought to confirm that the Stormwater Source Control Evaluation (SSCE)¹ work on the SOU met the needs of both the 2000 Joint Order and the 2016 UAO. In a letter dated February 15, 2017, DEQ requested Siltronic compile all SSCE work into a single work plan. As such, future work related to the SSCE will be provided in this monthly progress report related to the 2000 Joint Order. In doing so, unless DEQ instructs otherwise, Siltronic will proceed under the notion that this reporting regime will concurrently satisfy any overlapping requirements shared between the 2000 Joint Order and 2016 Unilateral Order concerning activities undertaken on the SOU, while also meeting DEQ's request that the SSCE work be conducted under a single work plan. Therefore, the 2000 Order Monthly

¹ In a letter dated May 23, 2017, provided by DEQ in response to Siltronic's submittal of its Revised Source Control Evaluation Work Plan, DEQ requested that "future related submittals appropriately reference stormwater source control only." Siltronic is happy to oblige and will hereafter refer to this work as Stormwater Source Control Evaluation (SSCE).

Progress Reports will include the SSCE efforts, and those activities related to the Gasco Operable Unit (GOU)–Allen property.

ACTIONS TAKEN UNDER THE 2000 JOINT ORDER SINCE THE PREVIOUS PROGRESS REPORT

Communications and Submittals

On June 8, MFA requested by email a meeting with A. Liverman and D. Bayuk of DEQ to discuss DEQ's May 23, 2017 comments on the SSCE workplan.

On June 10, MFA submitted a monthly progress report to DEQ for work performed on Siltronic's behalf in May 2017, pursuant to the 2000 Joint Order.

On June 19, MFA submitted a comment letter to DEQ on Siltronic's behalf regarding NW Natural's dense, non-aqueous phase liquid (DNAPL) Monitoring Summary Report for 2016.

On June 19, DEQ notified MFA via phone call that only technical staff were allowed to participate in the upcoming June 22 meeting to discuss DEQ comments on the SSCE workplan.

On June 22, MFA met with A. Liverman and D. Bayuk of DEQ to discuss DEQ comments on the SSCE workplan prior to Siltronic's implementation of the work described therein.

On June 22, DEQ requested Siltronic confirm in writing its selection of supervising contractor for the 2000 Order.

On June 23, Foley & Mansfield submitted a letter to DEQ on behalf of Siltronic confirming Siltronic's selection of supervising contractor for the 2000 Order.

On June 27, MFA participated in a Gasco/Siltronic project managers call with D. Bayuk (DEQ) and B. Hung (Anchor-QEA).

On June 27, DEQ acknowledged receipt of Foley & Mansfield's letter, dated June 23, confirming Siltronic's selection of supervising contractor for the 2000 Order.

Fieldwork

On June 1, 2017, MFA conducted bimonthly thickness measurements of Portland Gas & Coke (PG&C) waste DNAPL in WS-15-85, WS-33-81, and WS-43-36.

On June 5–21, MFA conducted monitoring of Siltronic groundwater wells, consistent with the DEQ-approved performance monitoring program.

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On June 22, MFA collected bimonthly combustible-gas measurements in support of the ongoing performance monitoring program, as required by DEQ.

On June 26, MFA collected bimonthly soil vapor samples, consistent with the ongoing performance monitoring program required by DEQ.

During June, Siltronic provided access, as necessary, to representatives of NWN for work associated with the NWN source control measures.

ACTIONS TO BE TAKEN IN THE NEXT TWO MONTHS

Communications and Submittals

Siltronic anticipates submitting meeting notes to DEQ documenting the June 22 technical meeting regarding the SSCE Workplan.

Fieldwork

July field activities will include quarterly water level measurements.

August field activities will include bimonthly PG&C waste DNAPL thickness measurements at selected wells (WS-15-85, WS-33-81, and WS-43-36); groundwater performance monitoring; bimonthly combustible-gas measurements; and bimonthly vapor sampling.

Weather permitting, additional overland flow pathway and groundwater-intrusion pathway observations will be conducted.

Weather permitting, stormwater sampling will be conducted consistent with the Revised SSCE Work Plan.

TEST RESULTS AND DATA RECEIVED

The attached Microsoft® (MS) Excel® data file contains performance and quarterly groundwater monitoring data, as well as the soil vapor data received through the end of the reporting period.

PROBLEMS EXPERIENCED OR RESOLVED

Soil vapor samples were not collected at locations SG-4 and SG-5 in April, May, or June 2017 due to the presence of water in the sample lines. The water is believed to be from perched groundwater that had accumulated due to the abundant precipitation that occurred during the unseasonably wet winter and spring months of 2017. Attempts to collect samples at these locations will be made in July 2017, pending the absence of water in the sample lines.

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Please call either Michael Murray or Courtney Savoie at (971) 544-2139 if you have any questions or comments regarding the contents of this month's progress report.

Sincerely,

Maul Foster & Alongi, Inc.

Michael R. Murray, RG, EIT

Senior Hydrogeologist

Attachment/enclosure:

Courtney Savoie, RG Project Geologist

MS Excel file (as attachment to the e-mail and on CD with the

hard copy)

cc: Myron Burr, Siltronic

Ilene M. Munk, Foley & Mansfield

Chris Reive and David Rabbino, Jordan Ramis

Keith Johnson, DEQ

Paul Siedel, DEQ

Henning Larsen, DEQ

Matt McClincy, DEQ

Eva DeMaria, USEPA

Sean Sheldrake, USEPA

Rene Fuentes, USEPA

Lance Peterson, CDM

Bob Wyatt, NWN

Patty Dost, Pearl Legal Group LLC

John Edwards, Anchor QEA LLC

John Verduin, Anchor QEA LLC

Carl Stivers, Anchor QEA LLC

Ben Hung, Anchor QEA LLC

John Renda, Anchor QEA LLC

Jen Mott, Anchor QEA LLC

Halah Voges, Anchor QEA LLC

Taku Fuji, Anchor QEA LLC

Rob Ede, Hahn and Associates, Inc.

ATTACHMENT

MS EXCEL FILE

